

EXHIBIT F

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JASON SILVERSTEIN, JENNIFER STAMATELOS,
individually and behalf of others similarly
situated,

PLAINTIFF,

CASE NO. 09-CV-5904 (VM)

-against-

ALLIANCEBERNSTEIN, L.P.,

DEFENDANT.

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DATE: April 3, 2012

TIME: 10:00 a.m.

EXAMINATION BEFORE TRIAL of the Opt-In
Plaintiff, JUSTIN GOTTLIEB, taken by the
Defendant, pursuant to a Notice, held at Seyfarth
Shaw, LLP., 620 Eighth Avenue, New York, New York
10018, before SHAVON KOLB, RPR, a Notary Public of
the State of New York.

<p>1 GOTTIEB</p> <p>2 Q. And that's your own business?</p> <p>3 A. Yes.</p> <p>4 Q. Is it part-time?</p> <p>5 A. Barely even. It's more of a referral</p> <p>6 business.</p> <p>7 Q. Do you have a partner or do you work</p> <p>8 with --</p> <p>9 A. No.</p> <p>10 Q. So you started looking for a new job</p> <p>11 when you were still working at AllianceBernstein,</p> <p>12 right?</p> <p>13 A. Correct.</p> <p>14 Q. Do you recall approximately when you</p> <p>15 started the job search?</p> <p>16 A. I don't recall exactly, no.</p> <p>17 Q. And how did you look for jobs?</p> <p>18 A. The Internet and recruiters.</p> <p>19 Q. Other than I'm assuming you interviewed</p> <p>20 at Barclays?</p> <p>21 A. Right.</p> <p>22 Q. Other than Barclays did you interview</p> <p>23 anywhere else?</p> <p>24 A. I did.</p> <p>25 Q. Where?</p> <p style="text-align: right;">[Page 38]</p>	<p>1 GOTTIEB</p> <p>2 Q. Did that person work as an APM?</p> <p>3 A. No.</p> <p>4 Q. And did you interview for the position?</p> <p>5 A. Yes.</p> <p>6 Q. Who did you interview with?</p> <p>7 A. From what I recall it was Tom Apostolico</p> <p>8 and Matt Kaplan and there may have been -- I don't</p> <p>9 remember if I met with the other guy but it was a</p> <p>10 while ago.</p> <p>11 Q. And you interviewed for the APM</p> <p>12 position?</p> <p>13 A. Right.</p> <p>14 Q. You didn't apply to AllianceBernstein or</p> <p>15 its predecessor at any point prior to 2005, did</p> <p>16 you?</p> <p>17 A. No.</p> <p>18 Q. Prior to hearing about the job through</p> <p>19 the family friend, were you familiar with the</p> <p>20 company at all?</p> <p>21 A. I believe I'd heard of them.</p> <p>22 MS. AHRENS: We'll mark another document</p> <p>23 as an exhibit.</p> <p>24 (Whereupon, the aforementioned resume</p> <p>25 was marked as Gottlieb Exhibit 4 for</p> <p style="text-align: right;">[Page 40]</p>
<p>1 GOTTIEB</p> <p>2 A. I don't recall everywhere. I know I</p> <p>3 interviewed at Bear Sterns. I don't remember all</p> <p>4 the other places.</p> <p>5 Q. Did you get any other offers?</p> <p>6 A. I believe I got an offer or two. I</p> <p>7 don't recall exactly.</p> <p>8 Q. You don't recall where?</p> <p>9 A. No.</p> <p>10 Q. When did you first apply for a job with</p> <p>11 AllianceBernstein or its predecessor?</p> <p>12 A. I don't recall the date.</p> <p>13 Q. You began working for AllianceBernstein</p> <p>14 in 2006, correct?</p> <p>15 A. Right.</p> <p>16 Q. You began working for AllianceBernstein</p> <p>17 in July 2005, right?</p> <p>18 A. Right. So it was some time three months</p> <p>19 prior I would assume, within three months.</p> <p>20 Q. And how did you hear about the position?</p> <p>21 A. Family friend of mine knew someone who</p> <p>22 worked there.</p> <p>23 Q. And who was the person that worked at</p> <p>24 AllianceBernstein, if you know?</p> <p>25 A. I don't even remember his name.</p> <p style="text-align: right;">[Page 39]</p>	<p>1 GOTTIEB</p> <p>2 identification as of this date by the</p> <p>3 Reporter.)</p> <p>4 MS. AHRENS: We just marked Exhibit 4.</p> <p>5 Q. Can you tell me what this document is.</p> <p>6 A. Looks like the resume I had at the time</p> <p>7 I was applying to AllianceBernstein.</p> <p>8 Q. And so it's the resume that you</p> <p>9 submitted in connection with that application?</p> <p>10 A. It's possible.</p> <p>11 Q. Do you have any reason to believe it's</p> <p>12 not the application that you submitted to</p> <p>13 AllianceBernstein?</p> <p>14 A. No. I'm not positive. I've changed it</p> <p>15 many times.</p> <p>16 Q. I can represent that we did take it out</p> <p>17 of your personnel file.</p> <p>18 A. Okay.</p> <p>19 Q. Did you prepare the document?</p> <p>20 A. Yes.</p> <p>21 Q. And can you look over it and let me know</p> <p>22 if it was accurate as of the time of your</p> <p>23 application to AllianceBernstein.</p> <p>24 A. To my knowledge it's accurate.</p> <p>25 Q. And then sitting here today is there</p> <p style="text-align: right;">[Page 41]</p>

[11] (Pages 38 to 41)

<p>1 GOTTLIEB</p> <p>2 Q. I believe you also said she would</p> <p>3 interact with you to talk about whether you were</p> <p>4 going to meet your deadlines; is that right?</p> <p>5 A. Not if you're going to meet them. If</p> <p>6 you were kind of pressing towards the deadline,</p> <p>7 she would stand behind you and basically do your</p> <p>8 job for you.</p> <p>9 Q. She would actually do your inbox work</p> <p>10 for you?</p> <p>11 A. Not necessarily the inbox work but if</p> <p>12 you were working on an account, she would tell you</p> <p>13 what to do like to get it done quicker.</p> <p>14 Q. And so how frequently did that occur?</p> <p>15 A. We were busy, I mean, it would probably</p> <p>16 happen for almost every deadline. Maybe not</p> <p>17 necessarily with me but with other people as well.</p> <p>18 Q. And then in terms of for you it happened</p> <p>19 when you were busy?</p> <p>20 A. Right.</p> <p>21 Q. And how often were you busy?</p> <p>22 A. What do you mean by that question you</p> <p>23 said?</p> <p>24 Q. Well, I'm just trying to get a sense of</p> <p>25 how often she would stand behind you and kind of</p> <p style="text-align: right;">[Page 62]</p>	<p>1 GOTTLIEB</p> <p>2 Q. And then you mentioned that you also</p> <p>3 interacted with her when there was anything out of</p> <p>4 the ordinary. What do you mean by that?</p> <p>5 A. If anything I saw that I hadn't</p> <p>6 experienced before and I wasn't sure what to do</p> <p>7 with it, I would go to her.</p> <p>8 Q. Did that happen more frequently in the</p> <p>9 beginning of your employment?</p> <p>10 MS. TURNER: Objection.</p> <p>11 You can answer.</p> <p>12 A. I don't recall when it would happen. I</p> <p>13 think it was sporadic.</p> <p>14 Q. What I'm trying to get at is in the</p> <p>15 beginning of your employment did you find things</p> <p>16 were more out of the ordinary because you hadn't</p> <p>17 already had the experience of performing those job</p> <p>18 duties.</p> <p>19 MS. TURNER: Objection.</p> <p>20 You can answer.</p> <p>21 A. Yes. That sounds reasonable.</p> <p>22 Q. And so about how frequently would you</p> <p>23 interact with Tuppy because you found something</p> <p>24 that was out of the ordinary that you wanted to</p> <p>25 talk to her?</p> <p style="text-align: right;">[Page 64]</p>
<p>1 GOTTLIEB</p> <p>2 tell you what to do in terms of your account work.</p> <p>3 A. Could be a couple of times a week,</p> <p>4 certain times of the year. It really fluctuated.</p> <p>5 Q. Do you know whether she did the same</p> <p>6 thing for the other APMs?</p> <p>7 A. Yes.</p> <p>8 Q. Do you also have a sense that that</p> <p>9 occurred about a couple of times a week for those</p> <p>10 APMs as well?</p> <p>11 A. More or less.</p> <p>12 Q. Were there some APMs that she would help</p> <p>13 more than others?</p> <p>14 A. Yes.</p> <p>15 Q. Did you have an understanding as to why</p> <p>16 she helped them more than others?</p> <p>17 A. Either less experience or not really</p> <p>18 good at the job I guess. I don't know.</p> <p>19 Q. So then other than Tuppy kind of telling</p> <p>20 you what to do on the accounts a couple of times a</p> <p>21 week when you were hitting up against a deadline,</p> <p>22 did you have any other interaction with her about</p> <p>23 meeting deadlines?</p> <p>24 A. About meeting deadlines specifically I</p> <p>25 don't recall.</p> <p style="text-align: right;">[Page 63]</p>	<p>1 GOTTLIEB</p> <p>2 A. I don't recall.</p> <p>3 Q. Do you have any sense whether it was</p> <p>4 once a day, once a week, once a month?</p> <p>5 A. I don't.</p> <p>6 Q. But is it true that it occurred more</p> <p>7 frequently at the end, towards the end of your</p> <p>8 employment than at the beginning of the</p> <p>9 employment?</p> <p>10 A. No.</p> <p>11 (Whereupon, the aforementioned letter</p> <p>12 was marked as Gottlieb Exhibit 9 for</p> <p>13 identification as of this date by the</p> <p>14 Reporter.)</p> <p>15 Q. Exhibit 9 is a letter that appears to be</p> <p>16 from you to Tuppy Stuer. Do you recognize this</p> <p>17 document?</p> <p>18 A. Yes.</p> <p>19 Q. And what is it?</p> <p>20 A. My resignation letter.</p> <p>21 Q. That's your signature?</p> <p>22 A. It is.</p> <p>23 Q. And you prepared it?</p> <p>24 A. Yes.</p> <p>25 Q. You prepared it on or about July 17,</p> <p style="text-align: right;">[Page 65]</p>

[17] (Pages 62 to 65)

<p>1 GOTTlieb</p> <p>2 2006?</p> <p>3 A. Yes.</p> <p>4 Q. And Tuppy Stuer is also Tuppy Russo,</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Was your last day of work around July</p> <p>8 28, 2006?</p> <p>9 A. I believe so.</p> <p>10 Q. When you first started working at</p> <p>11 AllianceBernstein as an APM, did you participate</p> <p>12 in any training?</p> <p>13 A. Yes.</p> <p>14 Q. What kind of training?</p> <p>15 A. There was some sort of handbook I</p> <p>16 remember reading and some training from some</p> <p>17 people there. I don't remember who it was.</p> <p>18 Q. Did you participate in any formal</p> <p>19 training?</p> <p>20 A. I guess how do you define formal?</p> <p>21 Q. Let's say if you're in more of a</p> <p>22 classroom setting where someone's lecturing you.</p> <p>23 A. Not really. It was more thrown</p> <p>24 together.</p> <p>25 Q. And do you recall if you shadowed any</p> <p style="text-align: right;">[Page 66]</p>	<p>1 GOTTlieb</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall how many?</p> <p>4 A. It was just a handful. Maybe five.</p> <p>5 Q. Do you know whether those five new APMs</p> <p>6 were put on different teams?</p> <p>7 A. No. They weren't on my team.</p> <p>8 Q. And you don't recall anything else about</p> <p>9 any other training, right?</p> <p>10 A. I don't remember specifically, no.</p> <p>11 Q. Were you ever a team leader?</p> <p>12 A. No. Not that I recall.</p> <p>13 Q. Were you ever on a team that had a team</p> <p>14 leader on it?</p> <p>15 A. Yes.</p> <p>16 Q. What's your understanding of what the</p> <p>17 team leader's functions are?</p> <p>18 A. They pretty much did the same thing as</p> <p>19 us. They were just more experienced; so they</p> <p>20 could do it quicker.</p> <p>21 Q. So other than the fact that they could</p> <p>22 do their job duties quicker, did you have any</p> <p>23 understanding about what their other functions</p> <p>24 would be?</p> <p>25 A. They would sometimes just tell people</p> <p style="text-align: right;">[Page 68]</p>
<p>1 GOTTlieb</p> <p>2 APMs; in other words, followed them around?</p> <p>3 A. Yes.</p> <p>4 Q. Do you recall who you shadowed?</p> <p>5 A. No, I don't.</p> <p>6 Q. Do you recall how long you shadowed them</p> <p>7 for?</p> <p>8 A. I don't remember.</p> <p>9 Q. Was the training mandatory?</p> <p>10 A. I believe so.</p> <p>11 Q. Do you recall anything else about your</p> <p>12 training at the beginning of your employment?</p> <p>13 A. Not really.</p> <p>14 Q. Did you participate in any training</p> <p>15 throughout the rest of your employment?</p> <p>16 A. I don't recall.</p> <p>17 Q. When you started working at</p> <p>18 AllianceBernstein, were you put on a team?</p> <p>19 A. Yes.</p> <p>20 Q. How many people were on your team in the</p> <p>21 beginning?</p> <p>22 A. I think it was a total of four.</p> <p>23 Q. Were you the most junior?</p> <p>24 A. Yes.</p> <p>25 Q. Did you train with other new APMs?</p> <p style="text-align: right;">[Page 67]</p>	<p>1 GOTTlieb</p> <p>2 what to do from the inbox but that's about it.</p> <p>3 Q. And what is the inbox?</p> <p>4 A. That's where the work from the FAAs</p> <p>5 would come in.</p> <p>6 Q. What's an FAA?</p> <p>7 A. I believe it stands for financial</p> <p>8 advisor's associate.</p> <p>9 Q. Were you on the same team throughout</p> <p>10 your employment?</p> <p>11 A. Not the entire time.</p> <p>12 Q. Do you know approximately how many teams</p> <p>13 you were on?</p> <p>14 A. There were a lot of changes but I don't</p> <p>15 think I was on more than three.</p> <p>16 Q. And did you always have approximately</p> <p>17 four people on each team?</p> <p>18 A. Yeah. It was always around four.</p> <p>19 Q. Was there ever a point where there was</p> <p>20 someone more junior on your team?</p> <p>21 A. Yes.</p> <p>22 Q. Did you assist in training that more</p> <p>23 junior person at all?</p> <p>24 A. I don't recall.</p> <p>25 Q. Did you have any training</p> <p style="text-align: right;">[Page 69]</p>

[18] (Pages 66 to 69)

EXHIBIT G

Justin Gottlieb

301 East 47th Street New York, NY 10017
908-208-4879 justingottlieb@gmail.com

July 17, 2006

Tuppy Steuer
AllianceBernstein
1 North Lexington Avenue
White Plains, NY
10601

Dear Tuppy,

Please accept this letter as my formal notice of resignation from AllianceBernstein, effective July 28th, 2006.

It's been a great pleasure working with you and representing the company. I wish you and AllianceBernstein continued success. Please feel free to call on me if I can help to ensure a smooth transition.

Thank you very much for the opportunity to work here.

Sincerely,



Justin Gottlieb

Associate Portfolio Manager